

# **EXHIBIT 1**

**BOIES SCHILLER FLEXNER LLP**  
David Boies (admitted *pro hac vice*)  
333 Main Street  
Armonk, NY 10504  
Tel: (914) 749-8200  
[dboies@bsfllp.com](mailto:dboies@bsfllp.com)

Mark C. Mao, CA Bar No. 236165  
Beko Reblitz-Richardson, CA Bar No. 238027  
Erika Nyborg-Burch, CA Bar No. 342125  
44 Montgomery St., 41st Floor  
San Francisco, CA 94104  
Tel.: (415) 293-6800  
[mmao@bsfllp.com](mailto:mmao@bsfllp.com)  
[brichardson@bsfllp.com](mailto:brichardson@bsfllp.com)  
[enyborg-burch@bsfllp.com](mailto:enyborg-burch@bsfllp.com)

James Lee (admitted *pro hac vice*)  
Rossana Baeza (admitted *pro hac vice*)  
100 SE 2nd St., 28th Floor  
Miami, FL 33131  
Tel.: (305) 539-8400  
[jlee@bsfllp.com](mailto:jlee@bsfllp.com)  
[rbaeza@bsfllp.com](mailto:rbaeza@bsfllp.com)

Alison L. Anderson, CA Bar No. 275334  
725 S Figueroa St., 31<sup>st</sup> Floor  
Los Angeles, CA 90017  
Tel.: (213) 995-5270  
[alanderson@bsfllp.com](mailto:alanderson@bsfllp.com)

*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

21 CHASOM BROWN, WILLIAM BYATT,  
22 JEREMY DAVIS, CHRISTOPHER  
23 CASTILLO, and MONIQUE TRUJILLO  
individually and on behalf of all similarly  
situated.

25 Plaintiffs,  
v.  
26 GOOGLE LLC,  
27  
28 Defendant

**SUSMAN GODFREY L.L.P.**  
Bill Carmody (admitted *pro hac vice*)  
Shawn J. Rabin (admitted *pro hac vice*)  
Steven M. Shepard (admitted *pro hac vice*)  
Alexander Frawley (admitted *pro hac vice*)  
1301 Avenue of the Americas, 32<sup>nd</sup> Floor  
New York, NY 10019  
Tel.: (212) 336-8330  
[bcarmody@susmangodfrey.com](mailto:bcarmody@susmangodfrey.com)  
[srabin@susmangodfrey.com](mailto:srabin@susmangodfrey.com)  
[sshepard@susmangodfrey.com](mailto:sshepard@susmangodfrey.com)  
[afrawley@susmangodfrey.com](mailto:afrawley@susmangodfrey.com)

Amanda K. Bonn, CA Bar No. 270891  
1900 Avenue of the Stars, Suite 1400  
Los Angeles, CA 90067  
Tel: (310) 789-3100  
[abonn@susmangodfrey.com](mailto:abonn@susmangodfrey.com)

**MORGAN & MORGAN**  
John A. Yanchunis (admitted *pro hac vice*)  
Ryan J. McGee (admitted *pro hac vice*)  
201 N. Franklin Street, 7th Floor  
Tampa, FL 33602  
Tel.: (813) 223-5505  
[jyanchunis@forthepeople.com](mailto:jyanchunis@forthepeople.com)  
[rmcghee@forthepeople.com](mailto:rmcghee@forthepeople.com)

Michael F. Ram, CA Bar No. 104805  
711 Van Ness Ave, Suite 500  
San Francisco, CA 94102  
Tel: (415) 358-6913  
[mram@forthepeople.com](mailto:mram@forthepeople.com)

Case No.: 4:20-cv-03664-YGR-SVK

**DECLARATION OF ROSSANA BAEZA  
IN SUPPORT OF PLAINTIFFS' REPLY  
IN SUPPORT OF THEIR RENEWED  
REQUEST TO DEPOSE GOOGLE CEO  
SUNDAR PICHAI**

## The Honorable Susan van Keulen

## **DECLARATION OF ROSSANA BAEZA**

I, Rossana Baeza, declare as follows.

1. I am an associate with the law firm of Boies Schiller Flexner LLP, counsel for Plaintiffs in this matter. I am an attorney at law duly licensed to practice before all courts of the State of Florida and admitted *pro hac vice* in this case (Dkt. 11). I have personal knowledge of the matters set forth herein and am competent to testify.

2. Attached as **Exhibit EE** is a true and correct copy of excerpts of the June 30, 2022 deposition of Sabine Borsay.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 9th day of August, 2022, in Nashville, Tennessee.

/s/ Rossana Baeza  
Rossana Baeza